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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 OAKLAND DIVISION

DONALD J. TRUMP et al.,
 Plaintiffs,
 v.
 YOUTUBE, LLC et al.,
 Defendants.

) CASE NO.: 4:21-cv-08009-YGR
)
) **STIPULATION AND [PROPOSED]**
) **ORDER TO CONTINUE INITIAL**
) **CASE MANAGEMENT**
) **CONFERENCE**

Hon. Yvonne Gonzalez Rogers

1 A Joint Case Management Statement on the above-captioned matter is currently due June
2 2, 2025, and an Initial Case Management Conference is set for June 9, 2025, at 2:00 p.m. via
3 videoconference.

4 The parties have engaged in productive discussions regarding next steps in this case, with
5 additional discussions anticipated in the near future.

6 The parties therefore respectfully request that the Initial Case Management Conference be
7 deferred by 90-days to September 8, 2025, and the Joint Case Management Statement be due
8 September 2, 2025.

9 Respectfully submitted,

10 Dated: May 27, 2025

FERGUSON COHEN, LLP

11 By: /s/ John Q. Kelly

12 John Q. Kelly

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13 *Attorney for Plaintiffs*

14 DONALD J. TRUMP, KELLY VICTORY,
15 AUSTEN FLETCHER, AMERICAN
16 CONSERVATIVE UNION, ANDRES
17 BIAGGIANI, MARYSE VERONICA JEAN-
LOIUS, NAOMI WOLF, AND FRANK
VALENTINE

18 Dated: May 27, 2025

WILSON SONSINI GOODRICH & ROSATI
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19 By: /s/ Brian M. Willen

20 Brian M. Willen

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21 *Attorneys for Defendants*

22 YOUTUBE, LLC AND SUNDAR PICHAI

23
24 SIGNATURE ATTESTATION

25 I, Brian M. Willen, am the ECF User whose ID and password are being used to file this
26 document. In compliance with N.D. Cal. Civil L.R. 5-1(i)(3), I hereby attest that the concurrence
27 in the filing of this document has been obtained from the other signatory.

28 /s/ Brian M. Willen

[PROPOSED] ORDER

Pursuant to stipulation, IT IS SO ORDERED. The Initial Case Management Conference is reset for September 8, 2025. The parties Joint Case Management Statement is due September 2, 2025.

Dated: _____, 2025

Hon. Judge Yvonne Gonzalez Rogers